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COMMENTS IN SUPPORT OF RETAINING AT LEAST A MINIMUM MORSE CODE PROFICIENCY REQUIREMENT FOR AMATEUR RADIO ACCESS

It has remained my belief that ALL amateur radio operators licensed by the FCC must be required to demonstrate proficiency in Morse Code operation to at least the five word per minute proficiency level at a minimum and to a higher performance level if possible. The following points should be considered.

1) Morse Code is historically the oldest means of transferring intelligence by radio. It requires intelligence and skill in learning and application. It continues to represent a tradition of the amateur radio service skill base that adds value to the individual worth of a ham radio operator, thus contributing to operator esprit de corps and pride of service. As a licensing *bona fide*, study and mastery of Morse Code is useful in bringing the most competent, motivated, sincere and hard-working ham radio operators possible into the ranks at the outset of the licensing process. In my opinion, irreverence for our amateur radio history and simplification for convenience and number-building of our already dumbed-down ham radio licensing process in the USA may be one cause of the increase in scofflaw activity and the "ugly Americanism" so evident on our amateur bands today. Morse makes the ham license mean something to a ham operator, in my opinion, more than just an easily-obtained piece of paper.

2) Morse Code skills and application directly address the emergency communication requirements of our part 97 Basis and Purpose. Morse Code has always provided, and will continue to provide, a viable, simple and often exclusively-available signaling method to convey information during communications outages and emergency conditions. Anything that may be turned on and off may be used to signal with Morse during emergencies. The more individuals available that know or have familiarity with Morse code for emergency use, the more likely public-necessity communications will succeed at minimum essential communication levels found during emergency conditions. This strength in diversity of modulation methods and numbers available to copy Morse Code is a benefit that many seem to ignore when arguing for elimination of Morse proficiency for amateur radio operations.

3) Dropping the Morse code requirement for amateur radio operators will, with time and the aging of skilled ops that now use Morse, decrease the pool of trained Morse operators that the military and the Government may call upon in the future. This short-sightedness may ultimately have an effect on national security later on. Quite simply, operators from rogue nations with Morse capabilities that exceed that of our own operators may be able to send traffic entirely in the clear with little chance of fully correct copy even with automated means of intercept and interpretation at the National-asset level. For example, the Russians, in the 80's and 90's, had operators that could send manual Morse Naval traffic in the clear at signal strengths just above the noise level at upwards of 70 wpm that neither our ops nor our machines could copy. Widening this communication gap by negating Morse Code copy skills in our citizens could have a devastating effect on future Homeland Security activities

and represent an utterly effective yet incredibly simple enemy communications denial method. Nations that forget low-tech in favor of only high-tech, sophisticated means of doing any task may well be doomed to suffer repeated insult and injury as has been amply shown to us by history. Not being able to copy the terrorist with a telegraph key and simple transmitter used to set up a future US attack may start with eliminating Morse from the skill base of US ham operators in the now.

4) Increasing the number of newcomers to the amateur service should not be the reason for dropping all Morse proficiency requirements. Per the NCI petition, numbers of operators appear to be all that matter in this instance. In a past similar response to a populist petition, the FCC created the Citizen's Band in the late 50's to allow the hoi polloi access to radio and its benefits sans examination for licensure. Licensing without benefit of skill building, history, tradition and the necessity to follow the law radio-wise resulted in the virtual deletion of the entire 11 meter spectrum allocation, rendering it useless for practical communications and impossible to police and stabilize against scofflaw activity. Elimination of the Morse Code requirement for future amateur radio licensure may create a similar loss of useable spectrum due to lack of a viable culture within the ham ranks.

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